

This comment responds to the recent change to the federal TCPA. There is no question that the issue is an important one to address. However, the elimination of "established business relationship" qualification from fax regulations does not take into consideration the undue burden this would place on the almost 10,000 trade and professional associations in the US. Trade associations are an important segment of the American business community. These voluntary organizations provide learning opportunities and a central resource of information for its membership. The fact that members have voluntarily paid dues to have access to the information disseminated by the association should establish the fact that communication from the association is not only accepted but desired. Most associations are not-for-profit, operate on tight budgets with a small staff while providing service to thousands of individual members. Requiring a not-for-profit association to gather written permission from its members is an expensive and undue burden that can have an immediate negative effect the products and services it provides its membership and the association itself. Faxing is the most efficient and economical means we can employ to continue to demonstrate the association's value to its industry, especially when particular members do not have access to email. Further, associations have the responsibility to providing immediate notification to its industry and membership regarding issues that may affect their businesses. In such cases where immediate notification and response is required, the US Postal mail service is not a viable option. If the ruling remains unchanged, in some instances, we will forced to communicate via "snail mail." This will decrease the value the association provides its industry and will cause an increased economic burden to the association and its staff. Please consider the difference between unsolicited advertisements and the information disseminated by associations to its membership. Also, please consider exempting associations and their communications with their members from the requirement of securing a signed approval before a fax with a commercial advertising solicitation is sent. Associations already have a voluntary, established relationship with its membership and these requirements will have a negative impact on all US Trade and Professional Associations. Thank you.